

Bedford, Massachusetts 01730-2318 Tel: (781) 275-6050 Fax: (781) 275-5651

5 Alfred Circle

info@mabbett.com www.mabbett.com

A SERVICE DISABLED VETERAN OWNED SMALL BUSINESS

February 26, 2010

Ms. Rosanne Sawaya-O'Brien Regional Task Order Contract Officer Representative U.S. EPA Region 1 5 Post Office Square Boston, MA 02109-3912

Subject:

EPA Contract No. EP-W-07-051, Task Order R01012

RCRA Facility Assessment ENPRO Services of Maine, Inc.

106 Main Street

South Portland, Maine

M&A Project No.: 7051012.003

Dear Ms. Sawaya-O'Brien:

In response to Task Order R01012 under EPA Contract No. EP-W-07-051, Mabbett & Associates, Inc. (M&A) has prepared a RCRA Facility Assessment for the ENPRO Services of Maine, Inc. facility in South Portland, ME. The RCRA Facility Assessment incorporates agency comments on the draft RCRA Facility Assessment issued previously. The RCRA Facility Assessment evaluates the potential for releases to the environment from areas of concern (AOCs), including solid waste management units (SWMUs), where releases of hazardous constituents may have occurred in the past.

Please contact me at (781) 275-6050 ext. 343 if you have any questions regarding this deliverable.

Very truly yours,

MABBETT & ASSOCIATES, INC.

BY:

CC:

Jámes R. Greacen

ames R Gruneon

Director, Site Assessment and Restoration

Enclosure: **Preliminary Summary of Findings**

James Chow, Chief, RCRA Corrective Action Section

Heather Jackson, ME DEP Paul D. Steinberg, (MF)

RCRA FACILITY ASSESSMENT REPORT

ENPRO Services of Maine, Inc. MED 019 051 069

106 Main Street South Portland, Maine

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
U.S. Environmental Protection Agency
Region I - New England
1 Congress Street, Suite 1100 (HBT)
Boston, MA 02114-2023

Task Order No.: R01012 Contract No.: EP-W-07-051

February 21, 2010

Mabbett & Associates, Inc. TOM: James R. Greacen 781-275-6050

EPA TOCOR: James Chow 617-918-1394

TABLE OF CONTENTS

1.0	EXECUTIVE SUMMARY 1					
2.0	INTRODUCTION4					
	2.1 File search and Visual Site Inspection	. 5				
3.0	FACILITY DESCRIPTION					
4.0 DESCRIPTION OF SITE ACTIVITIES AND HISTORY						
	4.1 Waste Management Practices	. 8				
	4.2 Regulatory History	10				
5.0	ENVIRONMENTAL SETTING	13				
	5.1 Site Location and Setting	13				
	5.1.1 Land Use	13				
	5.1.2 Topography and Surface Water	13				
	5.1.3 Geology and Hydrogeology	14				
6.0	SWMU AND AOC DESCRIPTIONS	15				
	6.1 SWMU 1 – Bulk Waste Oil	16				
	6.2 SWMU 2 – Waste Gasoline AST					
	6.3 SWMU 3 – Wastewater Treatment Plant	19				
	6.4 SWMU 4 – Non-Regulated Waste	21				
	6.5 SWMU 5 – 10 Day Holding Area	22				
	6.6 SWMU 6 – Solid Waste Roll-off Bins	24				
	6.7 SWMU-7 – Former Holding Area	25				
	6.8 SWMU-8 – Floor Sumps	26				
	6.9 SWMU 9 – Solid Waste	27				
	6.10 AOC 1 – Heating Oil AST	28				
	6.11 AOC 2 – Raw Material Storage	29				
	6.12 AOC 3 – Former USTs	30				
7.0	REFERENCES	33				
FIGUI	<u>RES</u>					
	e 1 – Location Map for the ENPRO Facility					
	2 – ENPRO SWMU Map					
Figure	e 3 – ENPRO AOC Map					
<u>TABL</u>	<u>ES</u>					
	1 – Solid Waste Management Units					
Table	2 – Areas of Concern	3				
<u>ATTA</u>	<u>CHMENTS</u>					
Attach	nment 1 – Solid Waste Management Unit (SWMU) and Area of Concern (AOC) List					
	nment 2 – Photographic Log					
Attach	nment 3 – Sandborn Maps					

ACRONYMS

AOC - Area of Concern

AST – Aboveground Storage Tank

CS – Confirmatory Sampling

DRO - Diesel Range Organics

ECC - Environmental Compliance Corporation

ENPRO - ENPRO Services of Maine, Inc.

EPA – U.S. Environmental Protection Agency

GAC - Granular Activated Carbon

HDPE - High Density Polyethylene

HSWA - Hazardous and Solid Waste Amendments

IM – Interim Measures

LQG – Large Quantity Generator

M&A - Mabbett & Associates, Inc.

MEG - Maximum Exposure Guideline

ME DEP - Maine Department of Environmental Protection

NOV – Notice of Violation

PR - Preliminary Review

RCRA - Resource Conversation and Recovery Act

RFA - RCRA Facility Assessment

RFI - RCRA Facility Investigation

SWMU - Solid Waste Management Unit

TPH - Total Petroleum Hydrocarbons

TSDF - Treatment, Storage, and Disposal Facility

UST - Underground Storage Tank

VSI – Visual Site Inspection

WWTP - Wastewater Treatment Plant

μg/L – Micrograms per Liter

1.0 EXECUTIVE SUMMARY

The first step in the Resource Conservation and Recovery Act (RCRA) corrective action process is the RCRA Facility Assessment (RFA). The RFA is conducted to assess if a release of hazardous waste or hazardous constituents has occurred from solid waste management units (SWMUs) and to identify potential area of concern (AOCs) at the facility. The main components of an RFA are to identify and gather information on releases at the RCRA facility; to evaluate SWMUs for releases to all media (groundwater, surface water, air, and soil); and to make preliminary determinations regarding releases of concern and the need for further action and interim measures at the facility.

An RFA has been conducted for the ENPRO Services of Maine, Inc. (ENPRO) facility located in South Portland, Maine. A file search of U.S. Environmental Protection Agency (EPA) Region 1 and Maine Department of Environment Protection (ME DEP) file material for the site was conducted in August 2008. Following completion of the file search, a preliminary review (PR) of the file material was conducted to develop an understanding of the site prior to conducting the visual site inspection (VSI). A VSI of the ENPRO facility was conducted on February 4, 2009, to address information gaps identified during the PR and to identify and document information associated with all SWMUs identified in the PR. Each SWMU identified during the PR was inspected and a meeting with facility representatives was conducted to obtain additional information. This report outlines the findings of the PR and the VSI.

Since 1981, the building and surrounding property have been used by ENPRO for the storage and treatment of oily waste generated during activities ENPRO performs offsite, such as tank cleaning and spill remediation services. Wastes managed on site include waste oil, waste gasoline, oil and gasoline contaminated water, and various hazardous wastes temporarily stored in transit to a disposal facility.

The ENPRO facility is an active Treatment, Storage and Disposal facility (TSDF) for waste gasoline. Additionally, ENPRO is a Large Quantity Generator (LQG) of waste oil, a waste oil storage facility, and a licensed transfer facility for the temporary storage of hazardous wastes. The facility is located at 106 Main Street, in South Portland, Maine. The geographical location of the facility is 43°38'07" latitude and -70°17'14" longitude. The site is listed as number 30188 in the Maine GIS online database. The location of the facility is shown on Figure 1. The facility is located in a commercially zoned area, in the midst of a mixed use area with commercial, industrial, and residential areas surrounding.

In general, the ENPRO facility is surrounded to the north by bulk oil tank farms, to the east and west by large cemeteries, and to the south by residential properties. The facility is bounded to the north and east by Carver Boulevard, to the west by Main Street, and to the south by a residential property.

The facility occupies approximately one-acre, with the onsite buildings occupying approximately

9,000 square feet of the property.

The facility was originally opened by Jet-line Services, Inc. in 1980, with on-site operations commencing in 1981. Jet-line operated as a generator and transporter of hazardous wastes, and applied for licenses to perform as a transporter and transfer facility for hazardous waste, primarily the temporary storage of D001-D004, F001-F015, K049, K051, and K052 wastes. The facility operated under a Hazardous Waste & Waste Oil Transporters License (No. 74 and No. 9, respectively), and a License to maintain and operate a combination hazardous waste (waste gasoline) and waste oil storage and treatment facility (No. 0-21-95-A-R and 0-17-95-O-N, respectively). They also maintained a Wastewater Discharge Permit to discharge effluent from their wastewater treatment system to the municipal sewer system (Ref. EN09).

In 1994, Jet-line was purchased and reorganized by Environmental Compliance Corporation (ECC). ECC reapplied for the existing licenses for the transportation, temporary storage, and treatment of waste oils and gasoline in order to continue to operate the facility. In 2001, ENPRO purchased the facility from ECC and applied to transfer all the permits. Since that time, ENPRO has been operating the facility. On-site operations have remained relatively consistent since 1981 when on-site waste oil storage and transportation activities began.

Based on the PR and information gathered during the VSI, a total of nine SWMUs and three AOCs were identified at the ENPRO facility. The names of these SWMUs and AOCs are listed in Attachment 1 and their locations are identified on Figures 2 and 3. In addition, an overview description of the SWMUs and AOCs is provided in Tables 1 and 2 and a more detailed discussion is provided in Section 6.0.

Table 1 - Solid Waste Management Units

SWMU#	SWMU Name	Type of Unit	Period of Operation	Waste Managed	Recommendation
1	Bulk Waste Oil	3 x ASTs – 15,000 gallons	1981 to present	Waste oils	No Further Action
2	Waste Gasoline AST	1 x AST – 6,000 gallons	1981 to present	Waste gasoline	No Further Action
3	Wastewater Treatment Plant	a. Water b. Solids c. Air	1992 to present	Wastewater	No Further Action
4	Non Regulated Waste	55 gallon drums	1981 to present	Misc. drummed wastes	No Further Action
5	10 Day Holding Area	55 gallon drums	2007 to present	Misc. regulated waste	No Further Action
6	Solid Waste Roll-off Bins	Covered bins	1981 to present	Solid wastes, oily solids, crushed used drums	No Further Action
7	Former Holding Area	55 gallon drums	1981 to 2007	Misc. drummed wastes, no longer utilized	No Further Action
8	Sumps	Liquid waste	1981 to present	Spill collection	No Further Action
9	Solid Waste	Domestic waste	1981 to present	Domestic wastes	No Further Action

Table 2 - Areas of Concern

AOC#	AOC Name	Type of Unit	Period of Operation	- Waste Managed	Release Potential
1	Heating Oil AST	1 x AST	1981 to present	No wastes managed, storing No. 2 Fuel Oil	No Further Action
2	Raw Material Storage	Virgin materials for WWTP	1981 to present	No wastes managed, storing materials for use in the WWTP	No Further Action
3	Former USTs	Groundwater monitoring	1992 to present	No wastes managed, DRO in groundwater	No Further Action

2.0 INTRODUCTION

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) provide authority in the RCRA program to assist the U.S. Environmental Protection Agency (EPA) in implementing corrective action at RCRA facilities. RCRA facilities include all facilities that currently treat, store, or dispose of hazardous waste (or have done so in the past) as regulated under RCRA. The first step in the RCRA corrective action process is the RCRA Facility Assessment (RFA). The RFA is conducted to assess if a release of hazardous waste or hazardous constituents has occurred from solid waste management units (SWMUs) and to identify potential area of concern (AOCs) at the facility. A SWMU is defined as any discernable waste management unit at a RCRA facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for management of solid and/or hazardous waste. An AOC is an area where evidence of spills or other releases have occurred resulting from management activities that may not fit the definition of a SWMU release. The main components of an RFA are to identify and gather information on releases at the RCRA facility; to evaluate SWMUs for releases to all media (groundwater, surface water, air, and soil); and to make preliminary determinations regarding releases of concern and the need for further action and interim measures at the facility.

Under Work Assignment No. R01012, EPA Region 1 requested that Mabbett & Associates, Inc. (M&A) conduct a RFA at the ENPRO Services of Maine, Inc. (ENPRO, the facility) located on Main Street in South Portland, Maine. This RFA report outlines the findings of the preliminary review (PR) and the visual site inspection (VSI). The purpose of the RFA was to identify, gather information on, and evaluate the potential for releases to the environment from AOCs, including SWMUs, where releases of hazardous constituents may have occurred in the past.

The specific objectives of the RFA are to:

- Perform a PR of the file material and conduct a VSI to assess the potential for release of hazardous wastes or hazardous constituents from each SWMU and AOC
- Identify all SWMUs and AOCs located at the ENPRO facility in South Portland, Maine
- Make preliminary determinations regarding releases of concern and the need for further
 actions, including confirmatory sampling (CS), RCRA facility investigations (RFIs) and/or
 interim measures (IMs) for each SWMU at the facility

2.1 File Search and Visual Site Inspection

A file search of EPA Region 1 and Maine Department of Environment Protection (ME DEP) file material for the site was conducted in August 2008. Following the completion of the file search, a PR of the file material was conducted in September 2008 to develop an understanding of the site prior to conducting the VSI. A list of references used to prepare this report is provided in Section 7.0.

Primarily, the PR focused on past and current facility waste management practices involving waste generation, treatment, and storage and/or disposal. The PR also included a review of other activities and areas, not involving waste, which may have exhibited a potential for releasing contaminants to the environment (e.g., drum, raw materials, or product storage areas, fuel storage or transfer areas; and other areas of contamination). As a result of the PR, a tentative list of SWMUs was identified and used to plan the VSI. The PR also identified additional information that needed to be gathered during the VSI to fully assess the potential for releases from SWMUs.

On February 4, 2009, a two-person ME DEP/contractor team (Heather Jackson, ME DEP and Kiran Sears, M&A) performed the VSI. The primary facility participants were Anne McNeil and Peter Grenier for ENPRO. The purpose of the VSI was to address information gaps identified during the PR and to identify and document information associated with all SWMUs identified in the PR. Each SWMU identified during the PR was inspected and a meeting with facility representatives was conducted to obtain additional information.

3.0 FACILITY DESCRIPTION

The EPA ID Number for the facility is MED 019 051 069. The ENPRO facility is an active Treatment Storage and Disposal Facility (TSDF), which provides tank and spill cleaning services, as well as the storage and transportation of hazardous waste. The facility is located at 106 Main Street, in South Portland, Maine. The geographical location of the facility is 43°38'07" latitude and -70°17'14" longitude. The location of the facility is shown on Figure 1. The facility occupies approximately one acre, and is located in a mixed commercial and suburban residential zoned area. The facility occupies two connected buildings, a two story brick building containing offices and the wastewater treatment system, and a one story metal storage building used primarily for drum storage. The two buildings occupy approximately 9,000 square feet of the property, with additional storage occurring outside in various structures (Ref. EN09).

The interior of the facility is constructed of concrete slab on grade. The concrete floors within the treatment and storage areas are sloped and surrounded by a 10-inch tall berm wall constructed of cement block and cement and provide leak protection around the entire footprint of the building.

The brick building contains a former temporary hazardous waste holding area, an active and inactive floor sump, raw materials storage, and the wastewater treatment system. The former temporary hazardous waste holding area is a diked 15-foot by 20-foot area divided into cells to separate oxidizers from flammable wastes. The floor and walls of this area are lined with epoxy coated metal. While the dikes and cells are still in place, storage no longer occurs in this area. All hazardous wastes temporarily held on-site are now stored in locked mobile storage units located outside the main building in the rear of the facility.

A sump is located in the center of the room, which holds approximately 200 gallons, and is piped into the wastewater treatment system. A second sump was located to the north of the temporary hazardous waste storage area. This sump was originally connected to the municipal sewer system, but was closed, and filled with concrete.

The one story metal portion of the main building is currently used for storage of non-regulated drummed waste, which is stored on-site before being shipped off-site for final disposal. The concrete floor in this area of the facility has an epoxy coating, with a 10-inch tall berm wall surrounding the footprint of the building for secondary containment.

Along the exterior of the facility, there is a concrete dike area containing three 15,000-gallon waste oil storage tanks, a 6,000-gallon waste gasoline tank, and a 1,000-gallon virgin heating oil tank. Additionally, there are two roll-off containers used for storage of nonhazardous waste, mostly consisting of bulked solids. There are two 10-day temporary storage trailers constructed with wooden walls, and a steel floor with 10-inch sides.

A detailed plan showing the ENPRO facility layout is provided as Figures 2 and 3.

4.0 DESCRIPTION OF SITE ACTIVITIES AND HISTORY

The location at 106 Main Street in South Portland, Maine was opened in 1981 by Jet-line Services, Inc. (Jet-line). Jet-line operated as a generator and transporter of hazardous wastes, providing hazardous waste transportation, tank cleaning and spill clean-up services, storage and treatment of waste oil, waste gasoline, and oil contaminated water. As gasoline is considered to be a hazardous waste under Federal and State regulations, the facility operates as a hazardous waste TSDF.

Prior to occupation by Jet-line, the use of the facility is not well known. It had been used for maintenance and equipment storage by a number of companies, as well as the storage of construction and welding materials. Historic topographic maps and Sandborn Maps show development in the area surrounding the site began in the late 1900s, with the area to the north and east having been used for oil storage since this time.

In August of 1980, Jet-line leased the property from SEA-ME, Inc., who then sold Jet-line the property in 1989. In 1988, Jet-line purchased the adjacent property, formerly occupied by Pappy's Sales and Service, a restaurant equipment supplier. Previous tenants at 100 Main Street included a music store, carpenter shop, and various other commercial activities. In 1994, Environmental Compliance Corporation bought the property from Jet-line for continued use as a TSDF. ENPRO Services of Maine, Inc. purchased the 106 Main Street facility from ECC in 2001, continuing the onsite operations and transferring all applicable licenses at that time (Ref. EN15, EN17).

The facility was originally licensed as a hazardous waste transporter and transfer facility, under the assumption that the facility would not be used to treat, dispose of, or store hazardous materials for more than ten days. However, waste was occasionally stored for greater than 10 days in order to allow enough waste to accumulate for a full shipment. As hazardous waste operations began at the site after April 1980, the facility was not permitted under a RCRA interim permit, therefore, a notice of hazardous waste activity was submitted in 1980, and a contingency plan was submitted to the EPA in 1981 indicating that the facility was used for the temporary storage of D001-D004, F001-F012, K049, K051, and K052 wastes (Ref. EN09).

Originally, the facility was authorized to store up to fourteen 55-gallon drums of flammable and up to seven 55-gallon drums of corrosive wastes in the 10-day temporary storage area prior to shipment to a licensed disposal facility (Ref. EN09).

In 1987, the facility submitted an application to perform upgrades to the treatment operations onsite, which detailed the addition of three aboveground storage tanks (ASTs) for waste oil and an AST for waste gasoline stored in a concrete vault located outside the facility building, a larger drum storage area, and a wastewater treatment system. The application was approved by the ME DEP in August 1990, and the upgrades were constructed.

In 2007, a number of modifications were made to the wastewater treatment system to upgrade existing steel vessels and piping with corrosion resistant ones. Three steel ASTs were replaced, a 10,000-gallon and two 8,000-gallon capacity horizontal vessels were replaced with five 6,100-gallon high density polyethylene units located within the same footprint. The upgrade of the vessels and associated piping did not impact the wastewater treatment process at the facility (Ref. EN29).

4.1 Waste Management Practices

ENPRO provides tank cleaning and spill cleanup services, and is a licensed transporter of waste. Onsite activities at this facility include the temporary storage of materials such as waste oil, gasoline, and hazardous and non-hazardous drummed wastes, as well as the onsite treatment of oil contaminated water.

Waste Oil and Gasoline

The ENPRO waste oil and gasoline treatment begins by decanting water from the product. Waste oil is stored in three 15,000 gallon ASTs located in a concrete bermed area at the rear of the facility. After the water has been decanted, the oil remaining is shipping off-site to licensed facilities for final disposal. The waste gasoline is stored in a 6,000-gallon AST also located within the bermed area. This waste is shipped off-site under a hazardous waste manifest to a facility that reuses the waste gasoline.

The bermed secondary containment area is equipped with a sloped floor and a recovery sump in the southwest corner. The area is 60 feet by 31 feet, and the concrete berm is six-feet high. The structure does not have a roof and is open to the environment. The structure consists of a three-foot thick slab underlain with oil and gasoline resistant liners.

The waste oil ASTs are 24-foot tall steel tanks with level indicators. The waste gasoline tank is a square double walled steel tank with cathodic protection within the interstitial space. The outside of the gasoline tank is surrounded with approximately four inches of reinforced concrete and sealed in a steel outer tank.

Wastewater Treatment

Decanted water is put through a five-micron bag filter to remove particulate waste. The wastewater is then processed through an oil/waste separation unit. Metals are precipitated out of solution by the addition of lime, then ferric sulfate. The final stage of treatment is an ultra filtration/carbon adsorption process. The water is sent through granular activated carbon (GAC) and then is pushed through 0.001-micron filters. The treated solution is discharged to the sewer system. The system is allowed to discharge up to 20,000 gallons per day.

Sludge generated from the precipitation and filtration processes are treated in a filter-press, tested to ensure that is non-hazardous, and then placed in covered 20 yard roll-off bins located outside

the building. The sludge is then shipped offsite for landfill disposal.

Air vents from the process equipment are piped into a limestone based scrubber along with a GAC unit before being discharged to ambient air through a vent. There are no permits necessary for the air discharge.

The entire system is washed down weekly. Wash water is collected with a wet/dry vacuum at a low spot in the floor and put back into the treatment system (Ref. EN15).

Non-Hazardous Waste Drum Storage

Non-hazardous waste drums are stored in the back room of the building. According to the license, drums can be stored in 7 separate rows, with up to 16 drums per row, with 3-foot wide aisles in between the drums. Drums are not stored on secondary containment, however, the floor of the room is sloped, with an epoxy coating, and there is a 10-inch concrete berm surrounding the entire room to prevent spills from reaching outside.

Transfer Facility - 10 Day Holding Area

ENPRO currently is licensed to operate as a temporary storage facility for hazardous and industrial wastes, which are stored on-site within transport vehicles. These wastes are shipped to ENPRO in licensed transport vehicles, stored at the facility in similar vehicles, remain on-site for a maximum of 10 days, and then are sent off-site for disposal. Temporary storage occurs in order to maximize the amount of material sent for disposal by ENPRO.

The transfer trailers are 48-foot to 53-foot self-contained trailers parked on top of asphalt pavement. The exterior of the trailers is constructed of coated wood. The interior has been retrofitted with a secondary contaminant system consisting of a steel diamond plate floor, with a 10-inch wall plate welded to the floor plate on three sides of the trailer. The back of the trailer has a removable plate which is fitted with a leak tight gasket. The gate is only removed to allow for loading and unloading of waste. Additionally, waste drums are stored on plastic containment pallets as an additional precautionary measure.

Drums are separated on the plastic containment pallets according to their contents in order to prevent mixing that could produce effects that are harmful to human health and/or the environment.

The trailers are rated to store up to 96 55-gallon drums for a total of 10 days onsite (EN32).

Former 10 Day Holding Area

Historically, hazardous waste was stored for up to 10 days inside the main facility room. This temporary 10 day holding area was constructed of three cells. The cells were divided to store Corrosive, flammable, and other materials in separate areas. The floor and walls of this area are lined with epoxy, and there was a 10-inch concrete dike in the front to act as secondary containment for the area. These cells are no longer in use, as all hazardous wastes are now

stored in the transfer trailers.

Loading / Unloading Area

Vehicles are parked in the loading/unloading area for all onsite activities, including waste oil and waste gasoline ASTs and all drummed waste. The area is constructed of six-inch reinforced concrete over oil resistant liners. The slab is sloped towards a sump which collects liquids released to the floor. The area is surrounded by a six-inch high concrete dike wall along the northern side, a five-foot dike wall on the southern side, and roll over berms to allow vehicular access to the area.

Roll-off Bins

The exterior yard wraps around the south and east sides of the building. The yard is where old equipment is stored, as well as a varying number of covered roll-off bins. The bins located adjacent to the transfer trailers are used for the storage of non-hazardous wastewater sludge to be shipped off for landfilling. Other bins across the site are used to store cleaned and crushed 55-gallon drums for disposal, oily solid waste, and general domestic waste.

4.2 Regulatory History

The facility operates under a Hazardous Waste and Waste Oil Transporters License, a License to maintain and operate a combination hazardous waste and waste oil storage and treatment facility, and a License to operate as a Hazardous Materials Transfer facility. The facility has a City of South Portland Industrial Wastewater Discharge Permit to discharge oil and gasoline contaminated wastewater and leachate from their treatment system.

The following is a list of significant regulatory events at the ENPRO facility:

In October 1980, Jet-line submitted a Notification of Hazardous Waste Activity to the EPA, which was followed in November 1980 by a Part A Permit to operate as a TSDF. In February 1981 the facility was inspected by both the ME DEP and the EPA. As a result of this inspection in May 1981 Jet-line was issued a Notice of Violation (NOV) stating that their contingency plan had not been completed.

Jet-line responded to the issues listed in the 1981 NOV and in August 1981 Jet-line requested that the ME DEP change their status to inactive, as they did not intend to store waste on-site for longer than 90 days, and therefore did not need to be listed as a TSDF.

The site was subsequently inspected a number of times in 1984, with minor violations found, the most notable being the presence of floor drains inside the main building which connected directly with the municipal sewer system, allowing for the possibility of an unplanned release of hazardous waste. A NOV was issued by the ME DEP detailing the violations found during these inspections in November 1984.

In January 1985, Jet-line applied for a license as a Hazardous Waste Transfer Facility, which was granted by the ME DEP in July 1987. This license allowed for the temporary (up to 10 day) storage of hazardous wastes on-site, to be transferred to another facility for disposal.

In November 1987 Jet-line applied to be a Waste Oil Storage Facility, and in July 1988 they reapplied for listing as a TSDF. Jet-line received an approval of this application in August 1990.

In 1989, the southern portion of the site was paved. During construction activities, discolored soils were noted approximately one foot below grade. Samples obtained from these soils showed elevated concentrations of total petroleum hydrocarbons (TPH) at a concentration of 100 mg/kg. Due to these elevated concentrations, a more thorough subsurface evaluation of the site was performed in 1990 to 1991, including soil borings and the installation of three groundwater monitoring wells.

Groundwater samples obtained from these three wells after installation repeatedly showed elevated concentrations of TPH (from $0.32~\mu g/L$ to $1.57~\mu g/L$) in the downgradient well, MW-2, located on the southeastern side of the property. In August 1992, free product was located in this well. A fuel oil underground storage tank (UST) located west of the monitoring well was tested, and it reportedly tested tight. As a precautionary measure, this UST was closed in place and replaced with an AST.

In September 1992 an abandoned leaking UST was found east of the property along the property boundary with the former Pappy's Sales and Service. Petroleum and water were noted in the tank, pumped out, and transported off-site for disposal. The UST was then removed, and 20 tons of petroleum impacted soils were removed from the vicinity of the tank grave and transported to Dragon Products in Thomaston, ME for recycling. Quarterly monitoring of the on-site wells were performed from 1993 through 2001, with MW-2 showing consistent exceedances of the Maine Maximum Exposure Guideline (MEG) for diesel range organics (DRO).

A NOV was issued to Jet-line by the ME DEP in April 1993 in regards to the current on-site operations. The NOV stated that adequate documentation detailing site operations was not being retained on-site at the time of the inspection. In a response to this NOV, Jetline stated that personnel were expecting the imminent sale of the business, and as such, limited operations were being performed on-site. Hazardous waste (D018) was not being treated or temporarily stored onsite but was still being transferred and only non-hazardous process wastewater and groundwater pumpouts had been accepted at the facility since November 1992.

In 1994, Jet-line was purchased and reorganized by Environmental Compliance Corporation (EEC). EEC reapplied for the existing permits for the transportation, temporary storage, and treatment of waste oils and gasoline in order to continue to operate the facility (Ref. EN15).

Additional NOVs were issued by the ME DEP in 1995 and 1999, stating that necessary paperwork was not being kept on file detailing daily inspections, that drums and waste storage

areas were not being properly labeled, and that drums were not being properly stored so that drums and labels were visible. These issues were responded to by EEC and dealt with (Ref. EN12, EN13).

ENPRO purchased the facility from Jet-line in 2001, intending to utilize the facility for the same purposes. ENPRO submitted an application to transfer the existing licenses to their corporation (Ref. EN17).

After the purchase was completed, in October 2001, ENPRO performed additional investigations in order to evaluate the subsurface conditions at the facility. A total of ten test borings (eight of which were completed as groundwater monitoring wells) were advanced on and adjacent to the property in the areas of potential environmental concern to evaluate upgradient and downgradient conditions and to determine if there were other possible sources of the DRO detections in groundwater on-site.

The results of this investigation showed no exceedences of applicable Maine standards for soil. Samples obtained for groundwater continued to show exceedances of the Maine MEGs for DRO. The contaminant concentrations detected in groundwater were generally consistent with the quarterly monitoring that had been performed since 1993, and no free product was noted in any of the new wells installed during this event. ENPRO suggested continued monitoring of on-site wells that showed elevated concentrations (Ref. EN34).

In 2004, ENPRO applied to have their TSDF permit changed so that they could accept metal contaminated wastes for storage onsite for up to 180 days (Ref. EN20). In 2006, the ME DEP issued ENPRO a NOV for five infractions regarding storage and labeling, which were resolved to the satisfaction of ME DEP.

In 2008, ENPRO submitted a renewal application for the TSDF permit, detailing current waste management procedures and activities occurring onsite, including the changes to the storage methods for temporary waste (Ref. EN32).

Since obtaining the property, ENPRO has continued to monitor groundwater wells across the site on a quarterly basis. A total of eight wells are gauged for free product and groundwater elevation, and out of these eight, samples are collected from five. The wells sampled were selected in order to observe upgradient and downgradient groundwater quality. The samples are analyzed for volatile organics and DRO. The contaminants detected at the site remain relatively consistent with historic levels.

The highest concentrations of contaminants have been detected in MW-9, along the southeastern end of the property. DRO in this well consistently remains well above Maine MEGs. ENPRO claims that based on the direction of groundwater flow in the area, monitoring well MW-5, located to the southwest of MW-9, is downgradient. Lower concentrations of DRO have been detected in this well (Ref. EN40).

5.0 ENVIRONMENTAL SETTING

5.1 Site Location and Setting

The ENPRO facility is located at 106 Main Street, South Portland, Maine, in Cumberland County. The geographical location of the facility is 43°38'07" latitude and -70°17'14" longitude. The location of the facility is shown on Figure 1.

The ENPRO facility is bounded on the north by Main Street, on the east and south by Carver Boulevard, and to the west by residences. The facility is surrounded by tank farms to the north, residential properties to the south, and cemeteries to the east and west.

The facility occupies approximately one acre, and is located in a mixed commercial and suburban residential zoned area. The facility occupies two connected buildings, a two story brick building containing offices and the wastewater treatment system, and a one story metal storage building used primarily for drum storage. The two buildings occupy approximately 9,000 square feet of the property, with additional storage occurring outside in various structures (Ref. EN09).

5.1.1 Land Use

The ENPRO facility is currently active and is used for the storage and treatment of waste oils and gasoline. There are approximately ten facility employees are present daily. According to facility representatives, the facility will remain in operation for the foreseeable future with no changes.

The site is located in a mixed use, residential, commercial, and industrial area. There are residences located adjacent to the facility; however, the majority of the land surrounding the site is made up of cemeteries and a large tank farm.

No schools or daycare facilities are located within 200 feet of the site.

5.1.2 Topography and Surface Water

The topography surrounding the ENPRO facility slopes slightly towards the east to Carver Boulevard. The site elevation is approximately 40 feet above mean sea level. There is a drop in elevation of approximately nine feet ground across the site.

Storm water runoff from the site goes into a storm drain located on Carver Boulevard, which leads to the municipal wastewater treatment plant in South Portland. This plant discharges treated wastewater to the Fore River.

The Site is approximately 1/4-mile south of the Fore River, and approximately four miles from

Casco Bay. Due to the predominant presence of brackish and salt water in the area, there are no surface water drinking intakes located within 15 miles downstream of the Site.

The ENPRO site is not located within either a 100 or a 500 year floodplain.

5.1.3 Geology and Hydrogeology

No records of private wells are maintained by the city; however, based on the land use and availability of public water, the City estimates that no one within ½-mile of the site has a private well.

Boring logs from monitoring wells 1 through 3 showed that the site is underlain by a medium to fine sand or sand and silt, underlain by a dense gray glacial till. Borings across the site were completed in the overburden, and did not encounter bedrock. The surficial geologic map of Maine describes the overburden in the area of the site as fine grained glaciomarine deposits consisting of silt, clay, sand and minor amounts of gravel, with a thickness of approximately 18-feet.

According to the 1985 Bedrock Geologic Map of Maine, bedrock beneath the facility is composed of Spring Point Formation, which is a metamorphosed bimodal volcanic rock.

Information collected indicates that groundwater flow direction in the overburden is approximately west to east, generally following the surface topography, at a depth of between three to six feet below ground surface. Testing performed in 1991 indicated that the average linear groundwater velocity across the site was between 31.4 to 35.5 feet per year.

No municipal water supplies are located within four miles of the property. The City of Portland Water Supply District supplies potable water to all the residents of South Portland. The water source for the City is Sebago Lake, located approximately 13 miles northwest of the site.

6.0 SWMU AND AOC DESCRIPTIONS

As previously described, an SWMU is defined as any discernable waste management unit at a RCRA facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste. An AOC is an area where evidence of spills or other releases of waste or petroleum products have occurred resulting from waste management activities that may not fit the definition of a SWMU.

The following section provides information about each SWMU and AOC obtained from the file material and gathered during the VSI. A total of nine SWMUs and three AOCs were identified at the facility. The name of each SWMU and AOC is listed in Attachment 1 and their locations are identified on Figures 2 and 3, respectively. Photographs of the SWMUs and AOCs, when available, were taken during the VSI and are included in Attachment B.

The pathway(s) through which a release impacts the environment, and potential exposure points and receptors along that pathway, is discussed for each SWMU and AOC. These pathways include groundwater, surface water, air, soil, and subsurface gas. It is possible for a release to impact the environment through more than one pathway. The likelihood for a release pathway to be active is designated by an L (low), M (moderate) or H (high).

The discussion also includes an evaluation as to whether the need for further action is recommended for each SWMU and AOC. When further action is not recommended, it is noted as "No Further Action Required." When further action is recommended, it can take the form of interim measures (IM), a confirmatory sampling visit (SV), or a RCRA Facility Investigation (RFI) for each SWMU and AOC at the Facility. Interim measures are typically recommended to reduce the risk of immediate exposure of a release to the environment, and may take the form of repackaging damaged drums or installing warning signs for worker protection. An SV is often recommended to confirm that a release has occurred in support of a decision to require an RFI related to a particular SWMU or AOC. An RFI is recommended when evidence of a release is identified (either through information obtained from the PR and VSI, or following an SV) and additional corrective actions may be necessary.

6.1 SWMU 1 – Bulk Waste Oil

TYPE OF UNIT: 3 x 15,000 gallon ASTs

PERIOD OF OPERATION: 1981 to present

PHOTOGRAPH NUMBER(S): 1, 2, and 4

PHYSICAL DESCRIPTION AND CONDITION:

This unit originally consisted of two aboveground, horizontal single walled steel tanks. Each tank had a capacity of 20,000 gallons. These tanks were installed in 1981 when the facility was opened. The tanks had no release controls, but there was sufficient secondary containment to prevent a release.

In 1992 the tanks were replaced. Waste oil is currently stored in three 15,000-gallon ASTs located in a concrete bermed area at the rear of the facility. The waste oil ASTs are 24 foot tall steel tanks with level indicators. This waste is shipped off-site on hazardous waste manifests to a facility that reuses the waste gasoline.

The bermed secondary containment area is equipped with a sloped floor and a recovery sump in the southwest corner. The area is 60-feet by 31-feet, and the concrete berm is six-feet high. The structure does not have a roof and is open to the environment. The structure consists of a three-foot thick slab underlain with oil and gasoline resistant liners. Also contained in this area is the Waste Gasoline AST (SWMU-2) and Heating Oil AST (AOC-1).

During the VSI, the sumps and secondary containment were observed to be empty and clean, and the concrete floors and walls were in good condition with minimal staining present.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Three separate tanks store mixed waste oil. Oil is generated during remediation services, such as tank cleaning or emergency response actions, combined with industrial oil from other generators. The oil accepted at the facility is often contaminated with water and dirt. Water is separated from the oil by heating, and the oily water is sent to the wastewater treatment system (SWMU-3).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (M)

Groundwater (M) Subsurface Gas (L)

6.2 SWMU 2 – Waste Gasoline AST

TYPE OF UNIT: 6,000-gallon AST

PERIOD OF OPERATION: 1981 to present

PHOTOGRAPH NUMBER(S): 3 and 4

PHYSICAL DESCRIPTION AND CONDITION:

Waste gasoline is stored in a 6,000-gallon AST also located within the bermed area. The waste gasoline tank is a square double walled steel tank with continuous leak detection operating within the interstitial space. The outside of the gasoline tank is surrounded with approximately four inches of reinforced concrete and sealed in a steel outer tank.

The AST is located inside the bermed area discussed in SWMU-1.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The waste gasoline AST contains gasoline. This waste is shipped off-site on a hazardous waste manifest to a facility that reuses the waste gasoline.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (M) Groundwater (M) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

There have been no releases reported in connection with the operation of this area. At the time of the VSI, this unit was in good condition. No stains were noted on the floor, and the concrete was in good condition. There was no evidence of previous spills inside the secondary containment areas.

RECOMMENDATION: No Further Action (X)
Confirmatory Sampling ()
RFI Necessary ()

COMMENTS:

As there are no reported releases from this unit, and because of the excellent housekeeping procedures associated with this unit, the good structural condition of the floor, and the presence of secondary containment, it does not appear necessary that sampling be performed to investigate the potential for release of hazardous constituents. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

HISTORY AND/OR EVIDENCE OR RELEASE(S):

There have been no releases reported in connection with the operation of this area. At the time of the VSI, this unit was in good condition. No stains were noted on the floor, and the concrete was in good condition. There was no evidence of previous spills inside the secondary containment areas.

RECOMMENDATION:	No Further Action	(X)
	Confirmatory Sampling	()
	RFI Necessary	()

COMMENTS:

As there are no reported releases from this unit, and because of the excellent housekeeping procedures associated with this unit, the good structural condition of the floor, and the presence of secondary containment, it does not appear necessary that sampling be performed to investigate the potential for release of hazardous constituents. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

6.3 SWMU 3 – Wastewater Treatment Plant

TYPE OF UNIT:

a. Water

b. Solids

c. Air

PERIOD OF OPERATION: 1992 to present

PHOTOGRAPH NUMBER(S): 5 through 7

PHYSICAL DESCRIPTION AND CONDITION:

Decanted water is put through a five micron bag filter to remove particulate waste. The wastewater is then processed through an oil/waste separation unit. Metals are precipitated out of solution by the addition of lime, then ferric sulfate. The final stage of treatment is an ultra filtration/carbon adsorption process. The water is sent through granular activated carbon (GAC) and then is pushed through 0.001 micron filters.

Sludge generated from the precipitation and filtration processes are treated in a filter press.

Air vents from the process equipment are piped into a limestone based scrubber along with a GAC unit before being discharged to ambient air through a vent. There are no permits necessary for the air discharge.

A number of the steel tanks were replaced with HDPE tanks in 2007 to prevent corrosion impacting the system. The system is in good operating condition.

The entire system is washed down weekly. Wash water is collected with a wet/dry vacuum at a low spot in the floor and put back into the treatment system (Ref. EN15).

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Treated wastewater is discharged to the municipal sewer system, and the site is permitted to discharge up to 20,000 gallons per day. Oil collected in the oil/water separator is sent back to the storage ASTs located outside of the main building (SWMU-1). The oil in these tanks is collected and sent offsite for disposal. Sludge collected in the filter press is placed in the covered 20 yard roll-off bins located outside the building (SWMU-6). This sludge is certified as non-hazardous and is shipped offsite for landfill disposal.

RELEASE PATHWAYS:

Air (L)

Surface Water (L)

Soil (L)

Groundwater (L)

Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

There have been no releases reported in connection with the operation of this unit. Additionally, the floors are in good condition, with no evidence of spills. The area is kept locked and is under supervision.

RECOMMENDATION:	No Further Action	(X)
	Confirmatory Sampling	()
	RFI Necessary	()

COMMENTS:

As there are no reported releases from this unit, and because of the excellent housekeeping procedures associated with this unit, the good structural condition of the floor, and the presence of secondary containment, it does not appear necessary that sampling be performed to investigate the potential for release of hazardous constituents. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

6.4 SWMU 4 – Non-Regulated Waste

TYPE OF UNIT: 55-gallon drums

PERIOD OF OPERATION: 1981 to present

PHOTOGRAPH NUMBER(S): 8 thought 10

PHYSICAL DESCRIPTION AND CONDITION:

Non-regulated wastes are stored in 55-gallon drums in a separate room. Based on available information, drums can be stored in seven separate rows, with up to 16 drums per row, with 3-foot wide aisles in between the drums. Drums are not stored on secondary containment, however, the floor of the room is sloped, with an epoxy coating, and there is a 10-inch concrete berm surrounding the entire room to prevent spills from reaching outside (Ref. EN32).

Drums are stored in rows, with adequate space between each row to walk through, and are properly labeled.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

According to information provided by facility representatives, the area is used to store non-regulated wastes, such as used SpeedyDryTM, oily rags or adsorbent pads, personal protective equipment drummed for disposal, etc.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L) Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

There have been no releases reported in connection with the operation of this area. Additionally, the floors are in good condition, with no evidence of spills. The area is kept locked and is under supervision.

RECOMMENDATION: No Further Action (X)
Confirmatory Sampling ()
RFI Necessary ()

COMMENTS:

As there are no reported releases from this unit, and because of the housekeeping procedures associated with this unit and the presence of secondary containment surrounding the room, it does not appear necessary that sampling be performed to investigate the potential for release of hazardous constituents. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

6.5 SWMU 5 – 10 Day Holding Area

TYPE OF UNIT: 55-gallon drums

PERIOD OF OPERATION: 2007 to present

PHOTOGRAPH NUMBER(S): 11 and 12

PHYSICAL DESCRIPTION AND CONDITION:

ENPRO currently operates a temporary storage area for hazardous wastes. These wastes are collected from various sites in the vicinity of the ENPRO facility, and are stored for a maximum of 10 days before being sent off-site to a licensed disposal facility.

The hazardous wastes are stored in transfer trailers located next to the loading dock. These trailers are 48-foot to 53-foot self-contained trailers parked on top of asphalt pavement. The exterior of the trailers is constructed of coated wood. The interior has been retrofitted with a secondary contaminant system consisting of a steel diamond plate floor, with a 10 inch wall plate welded to the floor plate on three sides of the trailer. The back of the trailer has a removable plate which is fitted with a leak tight gasket. The gate is only removed to allow for loading and unloading of waste. Additionally, waste drums are stored on plastic containment pallets as an additional precautionary measure.

Drums are separated on the plastic containment pallets according to their contents in order to prevent mixing that could produce effects that are harmful to human health and/or the environment (Ref. EN32).

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Wastes managed in this area vary from day to day. The list below contains wastes most commonly held in this area:

Characteristic	Wastes Managed	Code
Corrosive	Hydrochloric Acid, Sulfuric Acid, Hydrofluoric Acid, Nitric Acid, Phosphoric Acid, Chromic Acid, Muriatic Acid	D002
	Acetone, Methanol, Xylenes	F003
Ignitable	Alcohol, Butanol, Hexane, Ethanol, Paint thinners, Solvent NOS, Turpentine	D001
Ignitable/Reactive	Styrene	D001/D003
Ignitable/Toxic	Benzene, Toluene	F005
	Chlorobenzene	F002
Toxic	Pentachloroethane	U184
	Trichloroethylene	F001

Additionally, materials containing metals or metal hydrides could be held in this area. The materials are segregated by class onto different secondary containment pallets and into separate storage areas to prevent adverse reaction, such as heat generation, fire, explosion, or flammable or toxic gas generation.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (M) Groundwater (M) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

There have been no releases reported in connection with the operation of this area. Additionally, the floors are in good condition, with no evidence of spills. The area is kept locked and is under supervision.

RECOMMENDATION: No Further Action (X)
Confirmatory Sampling ()
RFI Necessary ()

COMMENTS:

As there are no reported releases from this unit, and because of the housekeeping procedures associated with this unit and the presence of secondary and tertiary containment, it does not appear necessary that sampling be performed to investigate the potential for release of hazardous constituents. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

6.6 SWMU 6 – Solid Waste Roll-off Bins

TYPE OF UNIT: Covered bins

PERIOD OF OPERATION: 1981 to present

PHOTOGRAPH NUMBER(S): 13 and 14

PHYSICAL DESCRIPTION AND CONDITION:

The roll-off bins are owned and operated by ENPRO. The bins contain non-hazardous solid oil-contaminated material and filter cake from the wastewater treatment system are located on concrete pads along the exterior of the building.

An additional roll-off bin containing clean crushed drums is located in an unpaved area to the north.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The roll-off bins contain a number of different wastes, including cleaned and crushed drums as well as oil contaminated sludge generated through the wastewater treatment process.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L) Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

There have been no releases reported in connection with the operation of this area. Additionally, the ground around the areas is in good condition, with no evidence of spills.

RECOMMENDATION: No Further Action (X)
Confirmatory Sampling ()
RFI Necessary ()

COMMENTS:

There were no records of any releases from this unit found in the file search, and no evidence of spills or leaks noted during the on-site reconnaissance. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

6.7 SWMU-7 - Former Holding Area

TYPE OF UNIT: 55-gallon drums

PERIOD OF OPERATION: 1981 to Present

PHOTOGRAPH NUMBER(S): 15 and 16

PHYSICAL DESCRIPTION AND CONDITION:

The original unit was a 25-foot by 15-foot area, enclosed with a 10-inch dike and separated by a 4-foot concrete wall. The unit is located in the southeastern portion of the wastewater treatment plant building.

The area was lined in 1987 with epoxy coated metal and provided with a concrete wall separating the corrosive storage area from flammable storage, breaking the unit up into four cells. Additionally, there is a beveled concrete floor and bermed doorways to prevent leaks.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Cells A, B, and C can be used to store hazardous waste for less than 10 days during transport of the waste from off-site generators to a disposal facility. Cell D is permitted for 180-day storage of waste gasoline containers and residues. Multiple types of hazardous waste have been stored here, the most common being characteristic flammable wastes and corrosive wastes.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (M)
Groundwater (M) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

No evidence of a release from this unit was identified in the available file material. In addition, according to facility representatives, no releases from this unit have ever occurred.

RECOMMENDATION: No Further Action (X)
Confirmatory Sampling ()
RFI Necessary ()

COMMENTS:

There were no reported historic releases from this unit. Additionally, this unit is no longer in use. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

6.8 SWMU-8 – Floor Sumps

TYPE OF UNIT: Floor Sumps

PERIOD OF OPERATION: 1981 to present

PHOTOGRAPH NUMBER(S): n/a

PHYSICAL DESCRIPTION AND CONDITION:

There are two floor sumps located in the main building. One sump is in the center of the building, and the second is located to the north. Both sumps were originally piped directly into the municipal storm sewer. The sump in the center of the building was rerouted to discharge to the wastewater treatment facility in 1987. The capacity of the sump is approximately 200 gallons. The second sump has been plugged and filled with concrete.

The sumps and visible piping appeared to be in good condition.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The sump is mostly used to collect wash water from the wastewater treatment system (SWMU-3). The exterior units of the system are washed on a routine basis for cleaning purposes. Additionally, the sump would collect the liquid waste from any spill that occurred in the main building, outside of the Former Holding Area (SWMU-7).

RELEASE PATHWAYS:	Air (L)	Surface Water (L)	Soil (L)
		Groundwater (L)	Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

There were no records of any releases from this unit found in the EPA or State files.

RECOMMENDATION:	No Further Action	(X)	
	Confirmatory Sampling	()	
	RFI Necessary	()	

COMMENTS:

None. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

6.9 SWMU 9 – Solid Waste

TYPE OF UNIT: Domestic Waste

PERIOD OF OPERATION: 1981 to present

PHOTOGRAPH NUMBER(S): n/a

PHYSICAL DESCRIPTION AND CONDITION:

A number of roll-off bins are present around the exterior of the facility to collect domestic waste. Trash in the building is collected in receptacles, which are emptied into the compactors by staff at regular intervals throughout the week.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The trash bins contain domestic waste for off-site landfill and disposal.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)

Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

There have been no releases reported in connection with the operation of this area. Additionally, the pavement around each of the compactors is in good condition, with no evidence of spills.

RECOMMENDATION: No Further Action (X)

Confirmatory Sampling ()

RFI Necessary (

COMMENTS:

As there are no reported releases from this unit, and because of the housekeeping procedures associated with this unit and the type of wastes managed, it does not appear necessary that sampling be performed to investigate the potential for release of hazardous constituents. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

6.10 AOC 1 – Heating Oil AST

TYPE OF UNIT: Fuel oil ASTs

PERIOD OF OPERATION: 1981 to present

PHOTOGRAPH NUMBER(S): 2

PHYSICAL DESCRIPTION AND CONDITION:

There is one No. 2 fuel oil AST located along the rear of the waste oil berm area (SWMU-1). This tank supplies the fuel for the boiler located in the main building for the heating system. The tank is rated for 1,000 gallons of fuel. There have been no reported issues with these tanks.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The tank contains No. 2 fuel oil used for heat generation in the facility. No wastes have been managed in this area.

RELEASE PATHWAYS:

Air (L)

Surface Water (L)

Soil (M)

Groundwater (M)

Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

No evidence of a release from this unit was identified in the available file material. In addition, according to facility representatives, no releases of oil from this unit have ever occurred.

RECOMMENDATION: No Further Action
Confirmatory Sampling

RFI Necessary ()

COMMENTS:

As there are no reported releases from this unit, and because of the housekeeping procedures (fit tests, etc.) associated with this unit, and the secondary containment, it does not appear necessary that sampling be performed to investigate the potential for release of hazardous constituents. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

6.11 AOC 2 – Raw Material Storage

TYPE OF UNIT: Virgin Materials

PERIOD OF OPERATION: 1981 to present

PHOTOGRAPH NUMBER(S): n/a

PHYSICAL DESCRIPTION AND CONDITION:

Raw materials are stored in areas of use in the main building, and outside the main building in a shed adjacent to the 10-day holding area (SWMU-5).

The floor in this area of the building is beveled concrete with bermed doorways, as well as the floor sump located in the middle of the building.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Hydraulic oil, motor oil, antifreeze used in vehicle maintenance are stored in small quantities in the main building. Sulfuric acid, sodium hypochlorite, caustic soda, lime, ferrous sulfate, and carbon are stored near the points of use in the wastewater treatment system. No wastes are managed in this area.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L) Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

No evidence of a release from this unit was identified in the available file material. In addition, according to facility representatives, no releases from this unit have ever occurred.

RECOMMENDATION: No Further Action (X)
Confirmatory Sampling ()
RFI Necessary ()

COMMENTS:

As there are no reported releases from this unit, and because of the housekeeping procedures associated with this unit, and the secondary containment, it does not appear necessary that sampling be performed to investigate the potential for release of hazardous constituents. Given the ongoing operation as a hazardous waste and waste oil facility, this may be subject to change in the future.

6.12 AOC 3 – Former USTs

TYPE OF UNIT: Groundwater monitoring wells

PERIOD OF OPERATION: USTs – unknown to 1992

Monitoring – 1992 to present

PHOTOGRAPH NUMBER(S): n/a

PHYSICAL DESCRIPTION AND CONDITION:

During a site investigation into the presence of oil found in groundwater in September 1992, two abandoned USTs were located along the ENPRO property. The first was located along the western end of the building. This tank was found to be in sound condition and was removed with no impacts to subsurface soil noted.

A second, leaking UST was found east of the main building. This tank was part of the former Pappy's Sales and Service property purchased by ENPRO. ENPRO was not aware of the status of the tank at the time of the property transfer. When the tank was investigated, petroleum and water were noted in the tank. The tank was then pumped out, and the fluids were transported off-site for disposal. The UST was then removed, and 20 tons of petroleum impacted soils were removed from the vicinity of the tank.

While the tank is not located immediately downgradient of the monitoring well containing oil, it has been hypothesized by ENPRO that released oil may have followed a preferential pathway along the building foundation to the south.

In October 2001, ENPRO performed additional investigations in order to evaluate the subsurface conditions at the facility. Eight additional groundwater monitoring wells were installed to evaluate upgradient and downgradient conditions and to determine if there were other possible sources of the DRO detections in groundwater on-site.

The results of this investigation showed no exceedences of applicable Maine standards for soil. Samples obtained for groundwater continued to show exceedances of the Maine MEGs for DRO. The contaminant concentrations detected in groundwater were generally consistent with the quarterly monitoring that had been performed since 1993, and no free product was noted in any of the new wells installed during this event. ENPRO suggested continued monitoring of on-site wells that showed elevated concentrations (Ref. EN34).

The groundwater wells across the site are monitored on a quarterly basis. A total of eight wells are gauged for free product and groundwater elevation, and out of these eight, samples are collected from five. The wells sampled were selected in order to observe upgradient and downgradient groundwater quality. The samples are analyzed for volatile organics and DRO.

The highest concentrations of detected contaminants have been detected in MW-9, along the southeastern end of the property. DRO in this well consistently remains well above Maine MEGs. MW-9 is located hydrogeologically downgradient of the facility building and the presumed release area. Based on the direction of groundwater flow in the area, MW-5 is directly downgradient of MW-9. The levels of DRO seen in MW-5 are well below those at MW-9, and are one order of magnitude below the MEGs (Ref. EN40).

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The former USTs were both removed in 1992. The tanks were believed to contain heating oil, and not waste oil. The UST located along the western side of the property was removed with no issues. The UST located along the northeastern side of the property was found to have leaked.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (H)
Groundwater (H) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OR RELEASE(S):

A release occurred at an unknown time prior to 1992 from the tank on the northeastern side of the property, believed to belong to the former Pappy's located at 100 Main Street, which now belongs to ENPRO. The amount of oil and the time frame in which the oil was released is unknown.

The contaminated soils found around the former UST grave were removed in an attempt to remediate subsurface conditions. Groundwater monitoring (discussed in more detail above), is performed quarterly.

The primary contaminant detected at the site is DRO. In initial investigations, full suites of VOCs were run, and the most commonly detected analytes were heavy petroleum constituents. Based on the types of oil released, it was determined to combine the analysis under DRO as opposed to individual VOCs, as this analysis gave a more complete view of subsurface contamination. In general, the concentrations detected remain relatively consistent with historic levels, indicating little to no movement of the groundwater contamination plume.

RECOMMENDATION:

No Further Action (X)

Confirmatory Sampling ()

RFI Necessary ()

COMMENTS:

ENPRO has assessed the subsurface conditions at the site, and currently monitors for the presence of contaminants via quarterly sampling events. The concentrations detected in groundwater across the site remain relatively consistent with historic levels. The groundwater

should continue to be monitored for any movement of the plume or worsening of conditions.

7.0 REFERENCES

Reference	Document Date	Title	Author
EN01	1985 April 11	Inspection Trip Report	James Glasgow – ME DEP
EN02	1986 November 26	Hazardous Waste Inspection Trip Report	James Glasgow – ME DEP
EN03	1989 September 14	Notice of Violation inspection conducted on May 23, 1989	Michael Hudson – ME DEP
EN04	1990 February 20	Waste Oil Storage Facility Inspection	Michael Hudson – ME DEP
EN05	1991 May 10	Environmental Subsurface Assessment for Jetline Services, Inc. at 106 Main Street Facility	TRC Environmental – Todd Knause
EN06	1991 June 11	Environmental Assessment Cover Letter	Jet-Line Services – Neal Drawas
EN07	1992 January 7	Notice of Violation – inspection conducted on September 26, 1991	Andrew Slusarski – ME DEP
EN08	1992 March 20	Trip Report – On-site Reconnaissance	Roy Weston, Inc.–Laurie V. Pavlos
EN09	1992 July 8	Final Preliminary Assessment Plus Report Jetline Services, Inc. S. Portland, ME	Roy Weston, Inc.
EN10	1993 April 1	Notice of Violation	Andrew Slusarski – ME DEP
EN11	1993 August 12	Notice of Violation-Land Disposal Restriction Rule	Matthew Hoagland - USEPA
EN12	1995 March 10	Notice of Violation and Enforcement Intent	Andrew Slusarski – ME DEP
EN13	1999 December 21	Notice of Violation conducted on September 24, 1999	Scott F. Leighton - ME DEP
EN14	2000 January 24	Notice of Violation, December 21, 1999	Leslie Mencher, ECC Environmental Manager
EN15	2000 February 7	Env. Compliance Corporation bought and reorganized the 106 Main Street, S. Portland Facility December 27, 1994	Scott F. Leighton, OHMSI ME DEP
EN16	2001 October 25	Memo Draft – Transfer Envir. Compliance Corp existing license to Environ. Facilities Inc.	Richard Kaselis Bureau of Remed.& Waste Mngmt
EN17	2001 November 15	Application to Transfer License for Haz Waste Facility	ENPRO – Leslie Mencher, David Cowie
EN18	2002 January 23	Enpro purchases former Environmental Compliance Corp Haz Waste Storage and facility	ENPRO – Leslie F. Mencher

Reference	Document Date	Title	Author
EN19	2004 July 10	Haz Waste Facility License and Waste Oil Storage Facility License Renewal Application	ENPRO – LeeAnne DelMonte
HTSIA	terita estat bereit	(with updated permits, current insurance, new Board Order, updated drawings, etc. included)	10000 000 000 000 000 000 000 000 000 0
EN20	2005 February 8	Permit Modification Request License No. O-000017-H1-J-R; #O- 000017-HR-J-R; #O-000017-97-G-R Attached letter – Draft Protocol for Transporting Waste Oil	ENPRO – LeeAnne DelMonte
EN21	2005 July 20	EMI Aboveground Tank Inspections	ENPRO – LeeAnn DelMonte
EN22	2005 October 18	DAC Acquired 106 Main Street, S Portland (the Property). Lease and letter attached	Pierce Atwood Attorneys at Law
EN23	2005 December 8	Memo Draft – Groundwater Monitoring Results thru September 2005, Enpro Facility, S Portland	Rob Peale – Bureau of Remediation and Waste Management
EN24	2006 March 8	Letter Report in Response to MEDEP Letter dated February 6, 2006	ENPRO – Anne McNeil
EN25	2006 April 21	Results of First Qtr GW Sampling 2006	ENPRO – Anne McNeil
EN26	2006 July 15	EMI Aboveground Tank Inspections	ENPRO – LeeAnn DelMonte and Corrtech Letter
EN27	2006 July 25	Results of Second Qtr GW Sampling 2006	ENPRO – Anne McNeil
EN28	2006 November 16	Comments concerning Enpro's second quarter groundwater sampling report for 2006	Richard Kaselis – BR&W Mngmt ENPRO – 2 nd Qtr GW Sampling 2006
EN29	2007 June 7	ENPRO Services of Maine, Inc. (EMI) Wastewater Treatment Storage Tank Upgrades	ENPRO – LeeAnn DelMonte
EN30	2007 July 31	EMI Aboveground Tank Inspections	ENPRO – LeeAnn DelMonte and Corrtech Letter
EN31	2007 October 14	ENPRO Services of Maine Department Staff met with ENPRO at facility and did walk thru.	Richard Kaselis – BR&W Mngmt
EN32	2008 February 15	Application for License by Rule for Hazardous Waste Facility Under the Maine Hazardous Waste, Septage and Solid Waste Management Act	ENPRO
EN33	2007 November 12	Phase I Environmental Site Assessment	Ransom Environmental Consultants, Inc.

Reference	Document Date	Title	Author
EN34	2002 February 1	Limited Subsurface Investigation	ENPRO Services, Inc.
		Summary Report	
EN35	1988 December	Instructions for Memtek Wastewater	Memtek
		Treatment System	
EN36	2003	Summary of Groundwater Monitoring	ENPRO Services, Inc.
		Results, 2003	
EN37	2004	Summary of Groundwater Monitoring	ENPRO Services, Inc.
		Results, 2004	
EN38	2005	Summary of Groundwater Monitoring	ENPRO Services, Inc.
	E = 1	Results, 2005	
EN39	2006	Summary of Groundwater Monitoring	ENPRO Services, Inc.
		Results, 2006	
EN40	2007	Summary of Groundwater Monitoring	ENPRO Services, Inc.
		Results, 2007	

FIGURE 1

Location Map for the ENPRO Facility

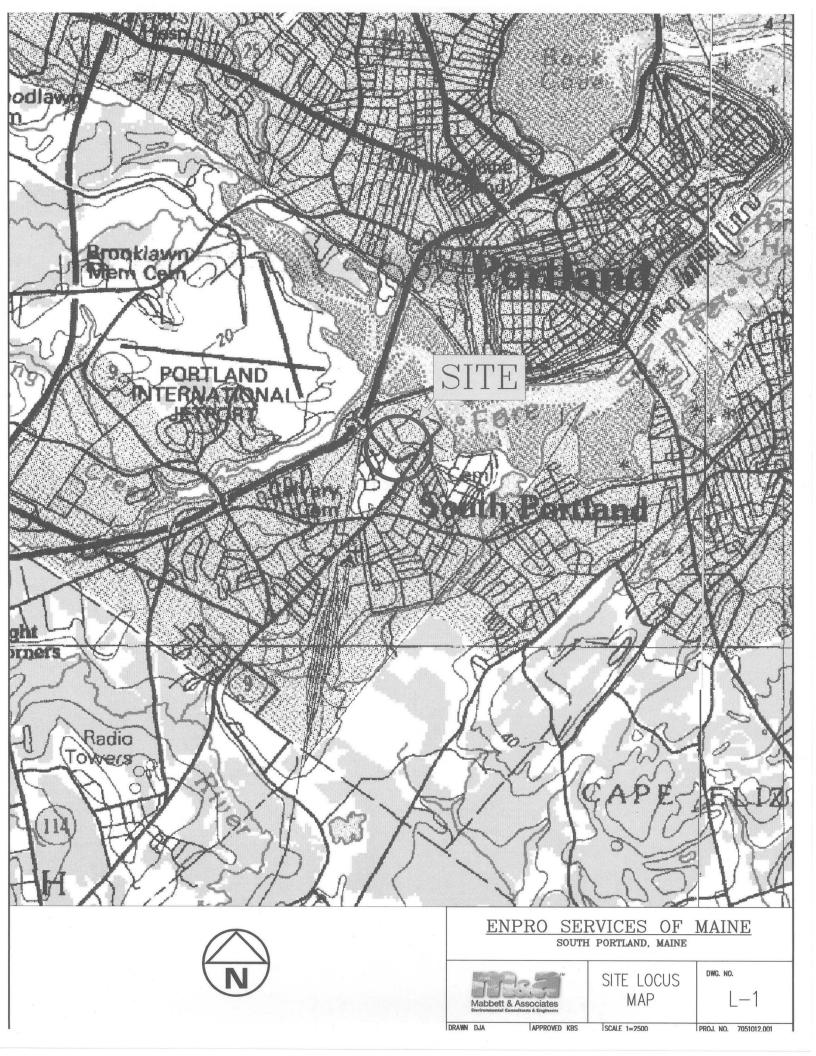
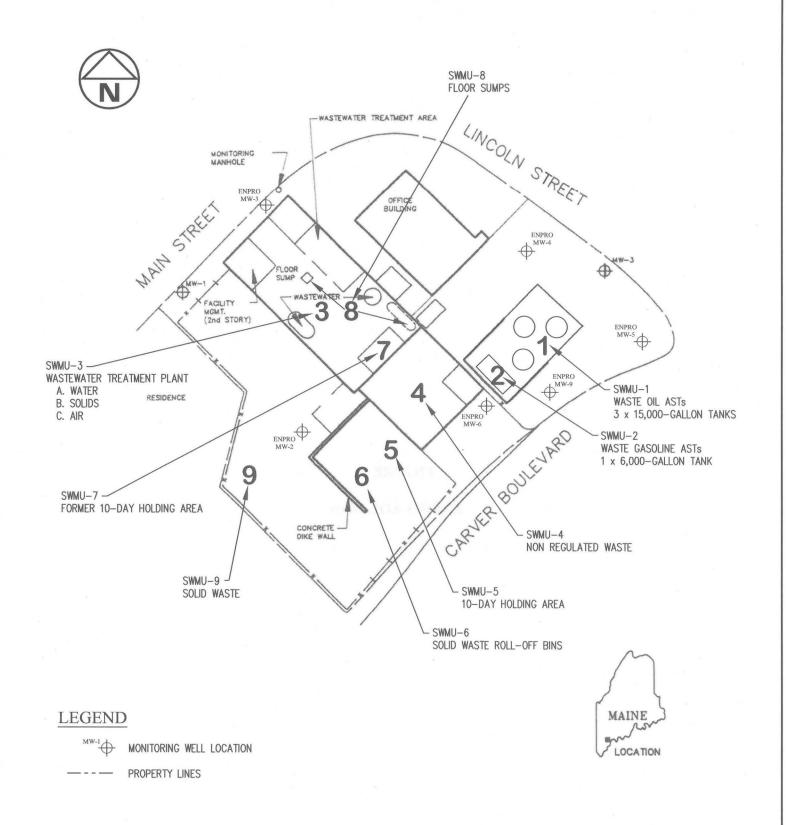


FIGURE 2
ENPRO SWMU Map



SOURCE:

FIGURE L-2 IS BASED ON DRAWING TAKEN FROM FINAL PRELIMINARY ASSESSMENT PLUS REPORT JETLINE SERVICES, INC. SOUTH PORTLAND, ME. (JULY 1992)

ENPRO SERVICES OF MAINE

106 MAIN STREET SOUTH PORTLAND, MAINE



SOLID WASTE MANAGEMENT UNIT MAP

|

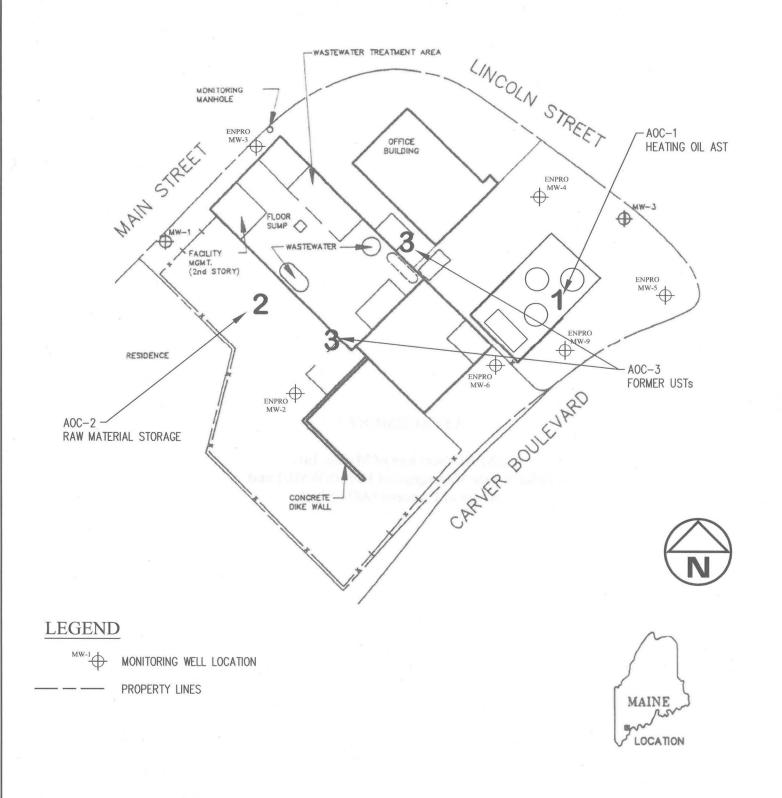
DRAWN DJA

APPROVED KBS

SCALE NOT TO SCALE

PROJ. NO. 7051012.003

FIGURE 3
ENPRO AOC Map



SOURCE:

FIGURE L-2 IS BASED ON DRAWING TAKEN FROM FINAL PRELIMINARY ASSESSMENT PLUS REPORT JETLINE SERVICES, INC. SOUTH PORTLAND, ME. (JULY 1992)

ENPRO SERVICES OF MAINE

106 MAIN STREET SOUTH PORTLAND, MAINE



AREAS OF CONCERN MAP DWG. NO.

DRAWN DJA

APPROVED KBS

SCALE NOT TO SCALE

PROJ. NO. 7051012.003

ATTACHMENT 1

ENPRO Services of Maine, Inc.
Solid Waste Management Unit (SWMU) and
Areas of Concern (AOC) List

ENPRO Services of Maine, Inc.

Solid Waste Management Unit (SWMU) and Areas of Concern (AOC) List

SWMU

- 1. Waste Oil ASTs $-3 \times 15,000$ gallons
- 2. Waste Gasoline AST 1 x 6,000 gallons
- 3. Wastewater Treatment Plant
 - a. Water
 - b. Solids
 - c. Air
- 4. Non Regulated Waste
- 5. 10 Day Holding Area
- 6. Solid Waste Roll-Off Bins
- 7. Former 10 day Holding Area
- 8. Sumps
- 9. Solid Waste

AOC

- 1. Heating Oil AST
- 2. Raw Material Storage
- 3. Former USTs

ATTACHMENT 2

Photographic Log



Photo 1: 15,000 gallon Waste Oil Tanks



Photo 2: 15,000 gallon Waste Oil Tanks and 1,000 gallon Heating Oil Tank



Photo 3: 6,000 gallon Gasoline Storage Tank

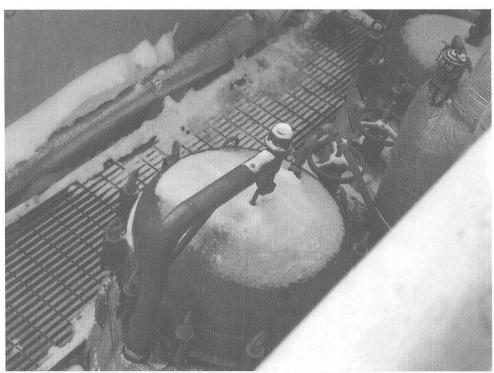


Photo 4: Tank Heating System and Sump

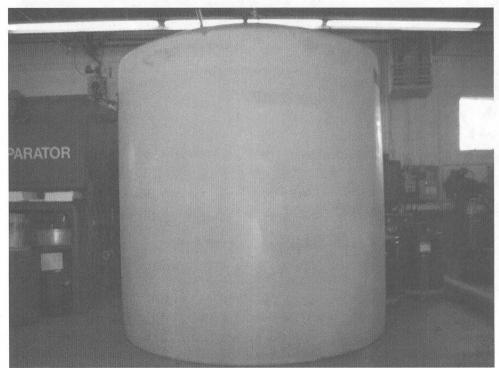


Photo 5: Wastewater Treatment System, Storage Tank

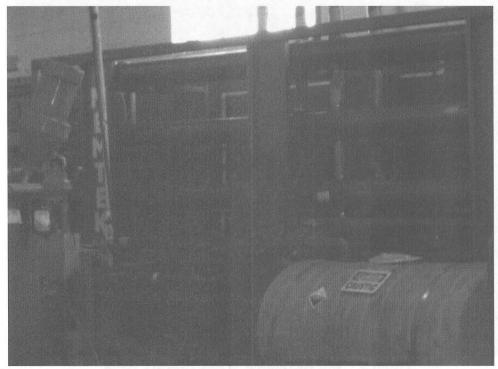


Photo 6: Wastewater Treatment System, Membrane Filters, Mixing Tank

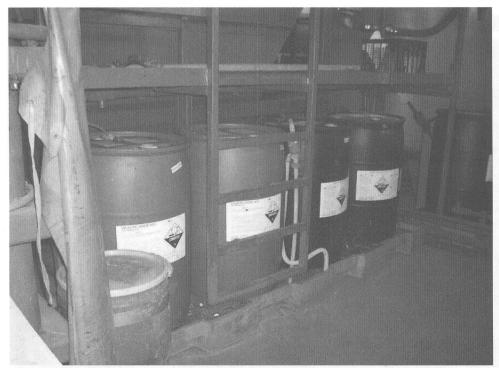


Photo 7: Wastewater Treatment System, Chemical Addition

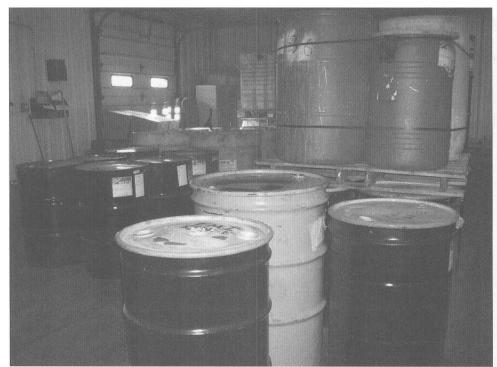


Photo 8: Non Regulated Waste Storage Area

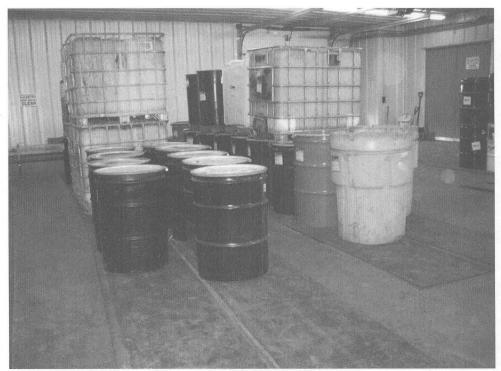


Photo 9: Non Regulated Waste Storage Area



Photo 10: Secondary Containment Around Entire Building



Photo 11: 10-Day Storage Trailer, Exterior

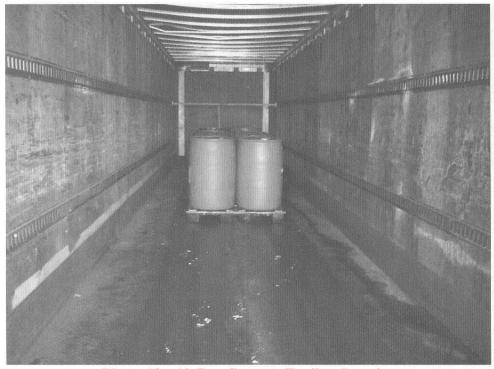


Photo 12: 10-Day Storage Trailer, Interior

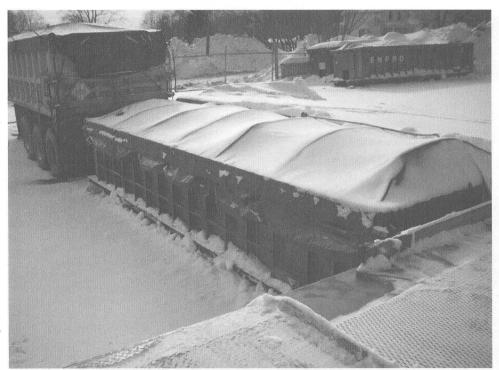


Photo 13: Solid Waste Roll Off Bin



Photo 14: Drum Crusher, Solid Waste Roll off Bin, 10-Day Storage Trailers



Photo 15: Former 10-Day Holding Area

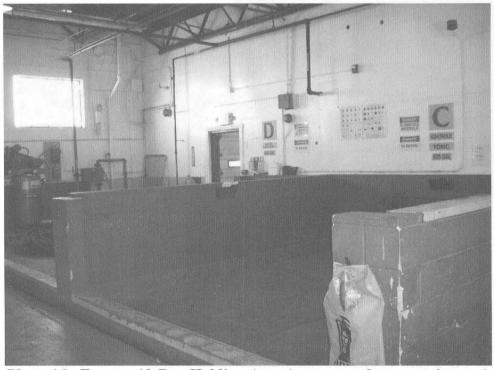


Photo 16: Former 10-Day Holding Area (note secondary containment)

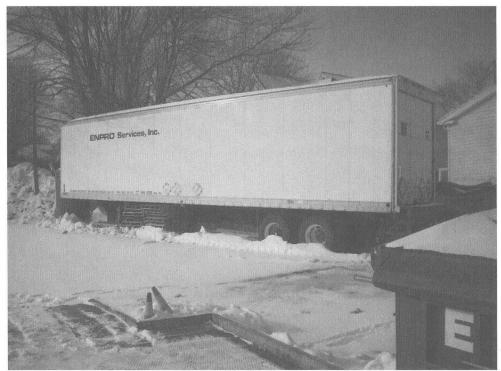


Photo 17: Paved Storage Yard, Entrance to Loading Area



Photo 18: Loading Area, Adjacent ENPRO property at 100 Main Street

ATTACHMENT 3

Sandborn Maps

ENPRO

106 Main Street South Portland, ME 04106

Inquiry Number: 2316696.4s

September 16, 2008

Certified Sanborn® Map Report



440 Wheelers Farms Road Milford, CT 06461 800.352.0050 www.edrnet.com

Certified Sanborn® Map Report

9/16/08

Site Name:

Client Name:

ENPRO

Mabbett & Assoc. 5 Alfred Circle

106 Main Street South Portland, ME 04106

Bedford, MA 01730

EDR Inquiry # 2316696.4s

Contact: Kiran Sears



The complete Sanborn Library collection has been searched by EDR, and fire insurance maps covering the target property location provided by Mabbett & Assoc. were identified for the years listed below. The certified Sanborn Library search results in this report can be authenticated by visiting www.edrnet.com/sanborn and entering the certification number. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by Sanborn Library LLC, the copyright holder for the collection.

Certified Sanborn Results:

Site Name:

ENPRO

Address:

106 Main Street

City, State, Zip:

South Portland, ME 04106

Cross Street:

P.O. #

4369

Project:

7051012.001

Certification #

DB48-4D9C-B643

Maps Identified - Number of maps indicated within "()"

1988 (1) 1909 (1)

1985 (1) 1896 (1)

1970 (1)

1954 (1)

1950 (1)

1922 (1)

Total Maps:



Certification # DB48-4D9C-B643

The Sanborn Library includes more than 1.2 million Sanborn fire insurance maps, which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

Library of Congress

✓ University Publications of America

✓ EDR Private Collection

Limited Permission To Make Copies

Mabbett & Assoc. (the client) is permitted to make up to THREE photocopies of this Sanborn Map transmittal and each fire insurance map accompanying this report solely for the limited use of its customer. No one other than the client is authorized to make copies. Upon request made directly to an EDR Account Executive, the client may be permitted to make a limited number of additional photocopies. This permission is conditioned upon compliance by the client, its customer and their agents with EDR's copyright policy; a copy of which is available upon request.

Disclaimer - Copyright and Trademark notice

This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. NO WARRANTY EXPRESSED OR IMPLIED, IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OF DAMAGE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT. Purchaser accepts this Report "AS IS". Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction or forecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

Copyright 2008 by Environmental Data Resources, Inc. All rights reserved. Reproduction in any media or format, in whole or in part, of any report or map of Environmental Data Resources, Inc., or its affiliates, is prohibited without prior written permission.

EDR and its logos (including Sanborn and Sanborn Map) are trademarks of Environmental Data Resources, Inc. or its affiliates. All other trademarks used herein are the property of their respective owners

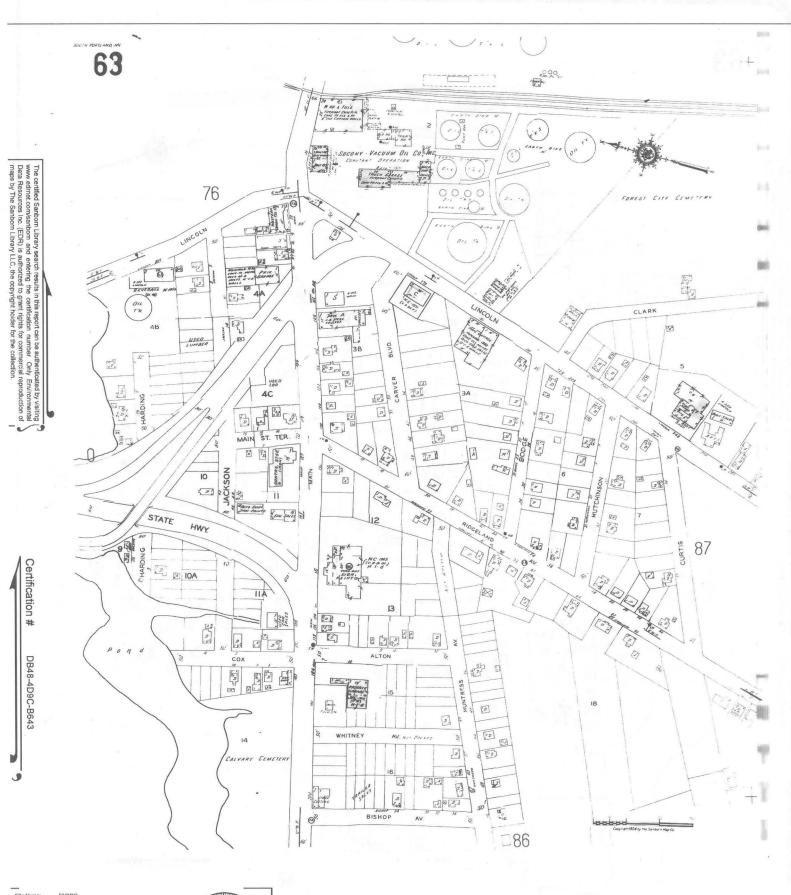






South Portland ME 04106 Mabbett & Assoc. 2316696 4s 9/16/2008 9:19:40 AM

City, ST, ZIP: South
Client: Mabbs
EDR Inquiry: 23166
Order Date: 9/16/2
Certification # DB48



Address:

106 Main Street

City, ST, ZIP:

Mabbett & Assoc. y: 2316696.4s 9/16/2008 9:19:40 AM Fair

Copyright: 1970

